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October 6, 2015

VIA EPA FOIA ONLINE SYSTEM

Regional Freedom of Information Officer
U.S. EPA, Region 2
290 Broadway, 26th Floor
New York, NY 10007-1866

Re: *TCI of New York, LLC, et ano v. Power Substation Services, LLC, et al*
Index No. 6566/2013
Our File No.: 262607

FREEDOM OF INFORMATION ACT REQUEST

Dear Sir or Madam:

We represent Power Substation Services, LLC in the above-referenced litigation.

Pursuant to the provisions of the Freedom of Information Act ("FOIA"), we hereby request copies of all documents,¹ correspondence, filings, permits, violations issued against, and other publicly available information regarding the following entities with respect to the facility located at 39 Falls Industrial Park Road, Hudson, New York 12534 (FRS ID 110000810034):

- TCI of New York, LLC;
- TCI Realty of New York, LLC; and
- KMOJ Acquisition LLC.

We note that as previously advised in connection with Request EPA-R2-2015-009385, the documents available in the EPA's online repository files concerning the above-referenced entities refer to permits, a consent agreement, and a final order, but do not contain the actual permits or full text of any orders, inspections, reports, or correspondence between the above-referenced entities. Copies of the repository files are attached for your convenience. Accordingly, we continue to request that copies of the above-referenced documents (rather than summaries of the same) be provided.

¹ "Documents" shall mean all original writing or records of every type and description (including any electronic data, compilation from which information can be obtained or translated through detection devices into reasonably useable form) that are or have been in the possession, custody or control of EPA or of which EPA has knowledge, including without limitation, computer disk, computer software, correspondence, memoranda, tapes, stenographic or handwritten notes, studies, photographs, pictures, films, voice recordings, maps, reports, surveys, charts, blueprints, minutes or statistical compilations, and computer printouts.

We are prepared to pay for any copying costs associated with your agency's response to this FOIA request. We request this information in order to evaluate Plaintiffs' claims in their lawsuit against our client. We would therefore appreciate a response as soon as possible and look forward to hearing from you shortly. If for any reason any portion of this request is denied, please inform our office of the reasons for the denial in writing and provide the name and address of the person or body to whom an appeal should be directed.

Please feel free to contact the undersigned should you have any questions, or need additional information regarding this FOIA request.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jaime L. Regan". The signature is fluid and cursive, with the first name "Jaime" and last name "Regan" clearly distinguishable.

Jaime L. Regan